

THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DAYVED WOODARD,

Plaintiff

vs.

PHB DIE CASTING

Defendant

) Docket No. 04-141E  
) (Judge Sean J. McLaughlin)  
)  
) ELECTRONICALLY FILED PLEADING  
)  
) JURY TRIAL DEMANDED  
)  
) SUPPLEMENTAL PRETRIAL NARRATIVE  
) STATEMENT OF DEFENDANT PHB DIE  
) CASTING  
)  
) Filed on behalf of: PHB Die Casting  
)  
) Counsel of record for this party:  
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**SUPPLEMENTAL PRETRIAL NARRATIVE STATEMENT**  
**OF DEFENDANT PHB DIE CASTING**

Defendant, PHB Die Casting, through its counsel, Knox McLaughlin Gornall & Sennett, P.C., files the following Supplemental Pretrial Narrative Statement:

Defendant, PHB Die Casting, ("PHB"), previously filed its Pretrial Narrative Statement in this action. Defendant's Pretrial Narrative Statement designated plaintiff's medical records as exhibits. By way of further clarification, PHB specifically designates all records of Ted Urban, Ed.D. the Occupational Health Center, Erie, Pennsylvania, Jerome L. Troncone, Psy.D., Hamot Medical Center, St. Vincent Health Center, and all medical records

relating to any injury, illness, or condition allegedly suffered by plaintiff prior to or during his employment at PHB. PHB also reserves the right to call any physician or medical practitioner who authored any of the foregoing records and/or any custodian with respect to the preparation and maintenance of such records.

PHB previously designated Robert M. Wettstein, M.D. as an expert witness in this case. PHB has received Dr. Wettstein's expert report dated August 22, 2005, a copy of which is attached hereto as Exhibit A.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.

BY: /s/ Richard A. Lanzillo, Esq.

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